

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
(EASTERN DIVISION)**

TS Merchandising Ltd., a British Virgin Islands corporation, and TS Production LLC, a Hungarian limited liability company,

Plaintiffs,

vs.

Dan and Loretta Hollings, Arizona residents, and Web Services, LLC, an Arizona limited liability company,

Defendants.

Case No. 07 C 6518

Hon. Ronald A. Guzman

**AGREED MOTION TO EXTEND DEADLINES
FOR BRIEFING ON DEFENDANTS'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Plaintiffs TS Merchandising Ltd. and TS Production LLC (collectively, "Plaintiffs"), by and through their attorneys, and Defendants Dan Hollings, Loretta Hollings, and WebServices, LLC (collectively, the "Defendants"), by way of special appearance without waiving any defenses relating to jurisdiction, and by and through their attorneys, respectfully move this Court for a two-week extension of the deadlines for remaining briefing on the Defendants' Motion to Dismiss for Lack of Personal Jurisdiction (the "Motion to Dismiss" or the "Motion"). In support of their agreed motion, the parties state as follows:

1. Defendants filed their Motion to Dismiss on February 6, 2008. The Motion asserts that none of the Defendants are subject to personal jurisdiction in this district.
2. On February 13, 2008, this Court entered an order staying discovery on the merits until the Motion to Dismiss is resolved [Dkt. 31]. In addition, the Court granted permission to

conduct discovery on jurisdictional issues, with Plaintiffs' response to the Motion due March 31, 2008 and Defendants' replies due April 14, 2008.

3. On March 12, 2008, Plaintiffs' counsel conducted the depositions of defendants Dan Hollings and Loretta Hollings. On March 13, 2008, Plaintiffs' counsel sent a letter to the Defendants' counsel requested in writing that Defendants produce on an expedited basis certain discoverable documents identified in the Hollings' depositions.

4. Since then, Defendants and their counsel have made a good faith effort to identify and collect documents responsive to the requests made in the Plaintiffs' March 13, 2008 letter, but have not yet been able to produce such documents. Their efforts continue, however, and Defendants expect to produce such documents shortly.

5. In addition, on March 27, 2008, the Defendants filed a Motion to Compel the deposition of Rhonda Byrne, a managing director of plaintiff TS Production LLC.

6. Accordingly, the parties jointly request that the deadlines for remaining briefing on the motion be extended by two weeks, to permit resolution of the pending Motion to Compel, to allow the Defendants additional time to respond to Plaintiffs' requests and to allow the Plaintiffs sufficient time to review and, if necessary, incorporate Defendants' documents and the information contained in them in Plaintiffs' response to the Motion.

WHEREFORE, the parties respectfully request that this Court enter an Order granting the Plaintiffs until April 14, 2008 to file their response to the Motion to Dismiss, and granting the Defendants until April 28, 2008 to file their reply in support.

Dated: March 31, 2008

Respectfully submitted,

/s/ Christopher I. Cedillo

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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2008, I electronically transmitted the attached document to the Clerk's office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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COPY of the foregoing and Notice of Electronic Filing
hand-delivered on the 1st day of April 2008, to:

Carole Gainer
Courtoom Deputy to
Honorable Ronald A. Guzman
United States District Court
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By: s/Christopher I. Cedillo